

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	:	<b>Chapter: 13</b>
<b>In Re: Robert J. Titus</b>	:	
<b>Helena M. Titus</b>	:	
<b>Debtors,</b>	:	<b>Bankruptcy No. 19-17728-AMC</b>
	:	
<b>U.S. Bank N.A.</b>	:	
<b>Movant</b>	:	
<b>-v-</b>	:	
	:	
<b>Robert J. Titus</b>	:	
<b>Helena M. Titus</b>	:	
<b>Respondents</b>	:	<b>Answer to Motion for Relief</b>
	:	
	:	

**ANSWER TO MOTION FOR RELIEF OF U.S. BANK N.A. FILED BY ROBERT J. TITUS  
AND HELENA M. TITUS , DEBTOR/RESPONDENT**

And now comes Robert J. Titus and Helena M. Titus, Debtors/Respondents, through their attorney Jeffrey A. Fournier, Esquire, files this response to the motion for relief file by U.S. Bank N.A., asserting the following answer:

- 1) Admitted.
- 2) Admitted.
- 3) Admitted.
- 4) Denied. Movant allege conclusions of law which do not require a response. Movants allegations were intended and has cause fear and panic with Debtor's, by way of a graphic description of action the Movant will take in the future that will result in the foreclosure and loss of their residence. The pure intent of this allegation in combination with other allegations in their motion, are intended to cause coercion to collect post petition payments in violation of the bankruptcy automatic stay.

5) Admitted.

6) Admitted.

7) Admitted. Debtor, Robert J. Titus is employed by Bucks County Community College. On May 29 2020, Debtor received a letter from the College informing him that his position was placed on temporary, unpaid leave of absence as a result the economic impact of CORVID-19 effective June 1, 2020. On June 14, 2020 Pennsylvania Department of Labor and Industry, Office of Unemployment Compensation Benefits issued a notice of final determination granting Debtor, Robert J Titus Unemployment Compensation Benefits in conjunction with Pandemic Relief Benefits. As of the date of this answer, Debtor, Robert J Titus hasn't received any benefits. The Debtor is in communication with the Pennsylvania State Representatives to obtain benefit that are past due. These benefits will allow Debtor to bring mortgage payments current.

8) Admitted.

9) Denied. The alleged principal balance due on the loan is overstated and does not include all payments received by Debtors and the Chapter 13 Trustee.

10) Denied. There is significant equity in the premises to adequately protect the Movant. Furthermore Debtors have the ability to commence monthly mortgage payments once the Commonwealth of Pennsylvania releases Unemployment Compensation benefits and Federal Pandemic Benefits.

11) Denied. Movement alleges the conclusions of law which do not require a response.

WHEREFORE, Debtors respectfully request that this Court deny the Movant's requested relief.

Respectfully submitted,

/s/ Jeffery A. Fournier, Esquire

Jeffery A. Fournier, Esquire

For David Ciarlante, Debtor/Respondent

**VERIFICATION**

**I, hereby state:**

- 1. I verify that the statements made in this pleading/answer are true and correct to the best of my knowledge, information and belief; and**
- 2. I understand that the statements made in this pleading/answer are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.**

Robert J. Titus